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Attorneys for Plaintiff,
GEORGIA-PACIFIC CONSUMER PRODUCTS LP

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

GEORGIA-PACIFIC CONSUMER
PRODUCTS LP, a Delaware limited
partnership,

Plaintiff,

v.

LEE'S GENERAL TOYS, INC., a California
corporation, JOHN LEE, an individual; and
DOES 1-100,

Defendants.

Civil Action No. 07-CV-02391 JAH (POR)

**DECLARATION OF ROBERT SANTIAGO
IN SUPPORT OF PLAINTIFF GEORGIA-
PACIFIC CONSUMER PRODUCTS LP'S
REPLY TO DEFENDANTS' OPPOSITION
TO SUPPLEMENTAL BRIEF IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Robert Santiago, hereby declare as follows:

2 1. I am the Director of Client Services for La Agencia de Orci, an advertising
3 agency specializing in marketing campaigns directed to the Spanish-language community. In
4 this capacity, I have consulted with Georgia-Pacific Consumer Products LP ("Georgia-Pacific")
5 with regard to a wide-range of marketing efforts, all of which are specifically-targeted to
6 Spanish-speaking consumers. I have personal knowledge of the matters set forth below and
7 could and would testify competently thereto if necessary.

8 2. Georgia-Pacific employs La Agencia de Orci to assist with advertising in the
9 Spanish-speaking market. We have worked closely with Georgia-Pacific to develop and air
10 television and radio commercials promoting Georgia-Pacific's ANGEL SOFT® bathroom tissue
11 products in Spanish.

12 3. Attached to the Notice of Lodgment filed by Georgia-Pacific concurrently with
13 this declaration as Exhibit 1, are true and correct recordings I directed to be reproduced in
14 DVD format of two of these television commercials, entitled "Getting Ready", "Shower",
15 "Sander/Sneeze" and "Nail/Buffer," as well as two recordings of radio commercials which also
16 promote Georgia-Pacific's ANGEL SOFT® products.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct and that this declaration was executed by me on this 4th day of March 2008.

19
20 
Robert Santiago